

Message Text

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PASS POTIER, USOECD

E.O. 11652: N/A

TAGS: SENV, OECD

SUBJECT: INDUSTRIAL POLLUTION CONTROL COSTS REPORTS

REF: GLASOE-POTIER TELCON

1. BECAUSE OF SHORT NOTICE OF JULY 10-13 OECD MEETING
ON TEXTILE AND ELECTROPLATING CONTROL COSTS REPORTS AND
INSUFFICIENT TIME FOR REVIEW OF REPORTS, US IS UNABLE TO
ATTEND CURRENT EXPERTS MEETING. US HAS QUICKLY REVIEWED
BOTH REPORTS AND PRELIMINARY COMMENTS ON REPORT OF EMISSION
CONTROL COSTS IN THE METAL FINISHING INDUSTRY FOLLOW.
REQUEST MISSION DELIVER THESE TO MEETING AND INDICATE TO
OECD SECRETARIAT (POTIER) THAT DETAILED COMMENTS ON BOTH
REPORTS WILL BE SENT FROM SWEP DAVIS IN THE NEXT FEW WEEKS.

2. THERE ARE SEVERAL ISSUES THAT SHOULD BE KEPT IN MIND
WHILE DISCUSSING EMISSION CONTROL COSTS IN THE METAL
FINISHING INDUSTRY.

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PAGE 02 STATE 175108

FIRST, THE ABILITY OF THE METAL FINISHING INDUSTRY TO
FINANCE POLLUTION ABATEMENT HAS BEEN A SIGNIFICANT FACTOR
IN REGULATING THIS INDUSTRY IN THE US. THIS MAY ALSO BE THE
CASE IN OTHER COUNTRIES. THUS, SOME TECHNOLOGIES MAY BE
TOO COSTLY FOR CERTAIN TYPES AND/OR SIZES OF FIRMS. TO

DEAL WITH THIS PROBLEM IN THE US EPA IS PROPOSING LESS STRINGENT WATER POLLUTION ABATEMENT REQUIREMENTS FOR SMALL OPERATIONS AND IS ENCOURAGING THE USE OF GOVERNMENT BACKED LOAN ASSISTANCE TO METAL FINISHING FIRMS. THE US WANTS TO POINT OUT THAT THESE PROVISIONS ARE FOR EXISTING SOURCE REGULATIONS. REGULATIONS FOR NEW SOURCES, WHEN THEY ARE DEVELOPED, WOULD BE LESS LIKELY TO INCLUDE SUCH PROVISIONS.

SECOND, THE METAL FINISHING INDUSTRY GENERATES POLLUTANTS OF DIFFERENT TOXICITIES. APPROPRIATE TECHNOLOGICAL STRATEGIES MAY NEED TO BE BASED IN PART ON CONSIDERATION OF THESE VARYING TOXICITIES. FOR EXAMPLE, US WATER POLLUTION REGULATIONS DO NOT REQUIRE CONTROLS ON COPPER, NICKEL AND ZINC DISCHARGES FROM SMALL METAL FINISHERS.

THIRD, AS IS IMPLICIT IN THE REPORT THERE ARE TWO TECHNOLOGICAL STRATEGIES FOR CONTROLLING POLLUTION IN THE METAL FINISHING INDUSTRY. POLLUTANTS CAN BE REDUCED BY TREATING THE EFFLUENTS, EMISSIONS AND SOLID WASTES RESULTING FROM METAL FINISHING OR POLLUTANTS CAN BE REDUCED THROUGH IN-PROCESS CHANGES, FLOW REDUCTIONS, AND MATERIALS RECYCLING. THE LATTER APPROACH, AT LEAST FOR EXISTING FACILITIES, GENERALLY COSTS MORE PER KILOGRAM OF A POLLUTANT REMOVED. HOWEVER, A LONG RUN STRATEGY BASED ON IN-PROCESS CHANGES AND MATERIALS RECYCLING MAY BE MORE UNCLASSIFIED

UNCLASSIFIED

PAGE 03 STATE 175108

ENVIRONMENTALLY AND ECONOMICALLY DESIRABLE THAN A STRATEGY AIMED SPECIFICALLY AT THE TREATMENT OF WASTES.

FOURTH, INCREASING RAW MATERIALS COSTS (INCLUDING PROCESS WATER COSTS) WILL GENERALLY LEAD TO REDUCTIONS IN THE QUANTITY OF CERTAIN POLLUTANTS, EVEN IN THE ABSENCE OF REGULATIONS. THESE COST INCREASES WILL FORCE FIRMS TO BE MORE EFFICIENT AND WASTE FEWER OF THESE MATERIALS AS POLLUTION. THUS, STRATEGIES FOR CONTROL MAY NEED TO CONSIDER WHICH POLLUTANTS WILL BE REDUCED BECAUSE OF INCREASING COSTS. CHRISTOPHER

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